

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

GRACE LAWRENCE)	
)	
Plaintiff,)	
vs.)	
)	Civil Action No. 02-CV-4440
TRANS UNION, LLC)	
)	
and)	
CITY OF PHILADELPHIA)	
)	
Defendants.)	

PLAINTIFF GRACE LAWRENCE'S PROPOSED VOIR DIRE

Plaintiff Grace Lawrence, by and through her undersigned counsel, respectfully submits the following Proposed Voir Dire.

PROPOSED QUESTIONS

1. Do any of you know any of the attorneys here before you, Mr. Luckman or Mr. Creech from the law firm of Satzberg, Trichon, Kogan & Wertheimer, P.C., Mr. Francis or Mr. Soumilas from the law firm of Francis & Mailman, P.C., or any member of these law firms?

2. The following witnesses may testify in this case. Please raise your hand in you know any of them:

Grace Lawrence
484 Redbud Ct.
Warrington, PA 18976

Anna Lawrence
484 Redbud Ct.
Warrington, PA 18976

Donna Stout
Chase Manhattan
Delaware or New York

Eileen Little
Trans Union, LLC
1510 Chester Pike
Crum Lynne, PA 19022

William Stockdale
Trans Union, LLC
555 West Adams
Chicago, IL 60661

Lorraine M. Ruiz
City of Philadelphia
34 S. 11th Street, Room 580
Philadelphia, PA 19107

Nancy Surbus
Superior Information Systems
P.O. Box 8787
Trenton, NJ 08650-0787

3. Do you or any member of your family or close friend presently work for, or have ever worked for, Trans Union, Experian, Equifax or any other credit reporting agency?

4. Do you or any member of your family or close friend presently work for, or have ever worked for, a bank, credit card company or other business in the capacity where you (or your family member or friend) regularly reports credit information or deals with credit disputes?

5. Have you ever been a party to a lawsuit? If so, state:

- (a) Whether you were plaintiff or defendant:
- (b) Was kind of case it was; and
- (c) What the outcome was?

6. Do any of you believe that under no circumstances should any individual or consumer ever sue another person or business?

7. Do any of you believe that a person should not be compensated with money for non-economic harm that another person or company wrongfully causes?

8. Do any of you believe that a person should not be compensated with money when a consumer reporting agency, such as Trans Union, reports inaccurate credit information about that person?

9. If the evidence in this case proved that the Grace Lawrence was harmed as a result of Trans Union's conduct in reporting inaccurate information, would any of you be reluctant or unable, for any reason whatsoever, to award a fair and substantial amount of monetary damages to her for:

- (a) emotional distress,
- (b) mental anguish;
- (c) humiliation;
- (d) embarrassment;
- (e) anxiety;
- (f) harm to credit;
- (g) harm to reputation?

10. Do all of you understand that a civil case, such as this one, should not be decided according to the standard of proof beyond a reasonable doubt – but rather by the greater weight of the evidence?

11. Do all of you understand that in a civil case, such as this one, a defendant need not be found “guilty” in order for the plaintiff to prove her case?

12. Do any of you view another person negatively simply because that person has brought a lawsuit against someone else?

13. Do any of you believe the notion that legitimate lawsuits cause insurance rates to be too high?

14. Some people think that juries as a whole are too generous in awarding money damages for plaintiffs. Are you one of these people?

15. Without having heard the any of the evidence or law in this case, do you have a limit on the amount of money you could award as damages to a person bringing a lawsuit? If so, what is the limit?

Respectfully submitted,

FRANCIS & MAILMAN, P.C.

BY:

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Dated: June 16, 2003